

# 800 Response Information Services LLC

## Ex Parte Filing

Ms. Marlene Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, DC 20554

Re: CC Docket No. 95-155 Toll Free Service Access Codes;  
CC Docket No. 96-115 Telecommunications Carrier's Use Of Customer Proprietary Network  
Information And Other Customer Information  
CC Docket No. 17-192 Toll Free Assignment Modernization

Dear Ms. Dortch:

On April 5, 2019, the undersigned of 800 Response, Bruno Tabbi of Ignition Toll Free, and Noah Rafalko of MessageComm, met (via telephonic bridge) with Nirali Patel, Wireline Advisor to Chairman Pai.

The purpose of the teleconference was to provide a general background on the geographic routing of toll free numbers, to review information about privacy protections inherent in process of routing toll free calls according to the geographic location of the caller, and to describe current impediments to the timely and accurate geographic routing of toll free calls and the nature and source of those impediments.

We also suggested that the ability to timely and accurately route toll free calls would have a significant impact on the valuation of numbers auctioned from the 833 NPA. The ability to share individual numbers among a group of independent customers or to terminate such numbers to many franchisees based upon closest location expands the resource, tailors service to callers seeking to connect with the closest business and allows many businesses access to quality vanity toll free numbers. These factors support a viable business case for potential purchasers of 833 numbers, resulting in a significantly greater value for each number.

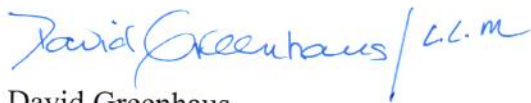
This "Shared Use" of high value numbers allows, for example, multiple entities to use 800-LAWYERS, depending on the origination location of the call. Were that number to be used by a single entity, providing services in a single state, the value of that number is diminished. Shared use will significantly increase the value of the most sought-after numbers in the 833 auction.

The Commission should direct mobile and other originating carriers to deliver to toll free service providers "fuzzy" (rather than precise) location information. In doing so, the originating carriers would be assured that they would not be in violation of any obligations to customers for the protection of their privacy. Therefore, toll free service providers would be free to offer

geographic routing and Shared Use services to customers with no undue call delay, latency or unnecessary caller interference while protecting privacy.

In the case of these services "opt in" or "opt out" is not only unnecessary, but also presents a hindrance and possible safety issue to callers, especially those that are operating motor vehicles. The Commission could achieve these goals through rendering a decision with respect to the Petition For Immediate Declaratory Relief or In the Alternative, Petition for Rulemaking, filed by 800 Response Information Services, LLC, CC Docket No. 96-115.

Sincerely,

A handwritten signature in blue ink that reads "David Greenhaus / C.C.M." with a stylized flourish at the end.

David Greenhaus

cc (via email):  
Nirali Patel